

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ANSYS, Inc.,)
Plaintiff)
v.)
)
Computational Dynamics North America,)
Limited d/b/a CD-adapco, and)
Doru A. Caraeni,)
Defendants.)

Civil Action No. _____

MOTION FOR PRELIMINARY INJUNCTION

Plaintiff ANSYS, Inc. (“ANSYS”) submits this Motion for Preliminary Injunction against Defendants Computational Dynamics North America, Limited d/b/a CD-adapco (“CD-adapco”) and Doru A. Caraeni. For the reasons set forth in the Verified Complaint and the accompanying Memorandum in support of this Motion, ANSYS requests that the Court:

- A. preliminarily enjoin Mr. Caraeni from being an employee, director, or consultant, and from otherwise engaging in or contributing his knowledge of Confidential Information (as that term is defined in the Verified Complaint) to CD-adapco;
- B. preliminarily enjoin CD-adapco from soliciting, hiring, employing, retaining, engaging, or offering a job or position to any person who is a party to a non-competition agreement with ANSYS that has not expired, without first obtaining a release from ANSYS of that person’s non-competition obligations;
- C. preliminarily enjoin Mr. Caraeni from using any Confidential Information or trade secrets of ANSYS, and from disclosing any Confidential Information or trade secrets of ANSYS to any other person, including CD-adapco;
- D. preliminarily enjoin CD-adapco from soliciting or seeking any Confidential Information or trade secrets of ANSYS, including from Doru or Mirela Caraeni or Patrick Jessee, and from using or disclosing any Confidential Information or trade secrets of ANSYS; and

E. grant such other and further relief as the Court deems necessary and appropriate.

Respectfully submitted,

ANSYS, Inc.

By Its Counsel,

McLane, Graf, Raulerson & Middleton,
Professional Association

Dated: August 17, 2009

By: /s/ Cameron G. Shilling

/s/ Cathryn E. Vaughn

Cameron G. Shilling (N.H. Bar No. 11363)

Email: cameron.shilling@mclane.com

Cathryn A. Vaughn (N.H. Bar No. 16508)

Email: cathryn.vaughn@mclane.com

900 Elm Street, P.O. Box 326

Manchester, NH 03105-0326

Telephone: (603) 628-1351